

EXHIBIT A

DRAFT SUPPLEMENTAL QUESTIONNAIRE

RYSTA LEONA SUSMAN, both
individually and as Legal Guardian of
SHANE ALLEN LOVELAND, et al., Plaintiffs, v. THE GOODYEAR TIRE & RUBBER
COMPANY, DEFENDANT

Juror Number _____

Name: _____
First MI Last

JUROR QUESTIONNAIRE

This questionnaire is designed to obtain information from you with respect to your qualifications to sit as a juror in this case. Before the case can start, a jury must be selected. The judge and the people involved in the case need to know something about you in order to select jurors who can be fair to both sides. In order to move jury selection along as quickly as possible, the court has prepared this background questionnaire to be completed before you are called to the jury box. You should fill out this questionnaire by yourself without consulting any other person.

The questions on this form are designed to help the court and the lawyers learn something about your background and your views on issues that may be related to this case. The questions are not asked to invade your privacy, but to make sure that you can be a fair and impartial juror.

You should answer the questions honestly, carefully and completely. Please do not leave any questions blank. If a question does not apply to you, simply write N/A (for Not Applicable) in the space for the answer. If there is no response to a question, we will assume that you mistakenly skipped it and may ask you about it in court.

Since we need to make copies, please DO NOT write on the back of any page. If you need more room, continue at the bottom or side of the page or on the blank page at the end of the questionnaire. When you have completed the questionnaire, please give it to the attendant.

You may be asked follow-up questions later to clarify your answers. If there are questions that you would feel more comfortable answering in private, simply write “**private**” in the space provided for your answer and circle the question number. The follow-up questions on that topic will be held out of the presence of the other jurors. After you have finished the questionnaire, let the clerk know that you have circled one or more question numbers.

If you have trouble reading, understanding, or filling out this form, please let the court clerk know. If you do not understand a question, please write “I DO NOT UNDERSTAND” and the question will be explained to you in Court.

PLEASE REALIZE THERE ARE NO RIGHT OR WRONG ANSWERS.

Please complete the questionnaire and (hand to clerk/bailiff?) _____.

PLEASE REMEMBER YOU ARE ANSWERING THESE QUESTIONS UNDER PENALTY OF PERJURY. YOUR ANSWERS MUST BE TRUE AND COMPLETE.

1. Please tell me your gender:

1. Male 2. Female 3. Other

2. In which county do you live? _____

3. Is English your first language?

_____ Yes _____ No

If no, what is your first language? _____

4. What is your current employment status?

1. Employed full time	5. Looking for work
2. Employed part time	6. Retired
3. Homemaker	7. Disabled
4. Full-time student	8. Other

5. What is your current occupation and who do you work for?

6. What is your marital status:

1. Single, never married
2. Divorced, or separated
3. Widowed
4. Married

7. If applicable, what is your partner/spouse's current occupation and who does he/she work for?

8. What is the highest level of education you have completed?

1. Grade school
2. High school graduate or GED
3. Some college or junior college degree
4. College degree
5. Graduate degree (MA, MBA, JD, PhD, etc.)
6. Technical, trade, or business school

9. What was your area of study? _____

10. What are your pastimes or hobbies?

11. Do you belong to any social or volunteer clubs or organizations?

_____ Yes _____ No

If “Yes,” which ones and describe any leadership positions you hold.

12. What are your primary sources of news?

1. Internet. (Which websites?) _____)
2. TV/Cable news. (Which station(s)? _____)
3. Radio. (Which station(s)? _____)
4. Newspaper. Which one(s)? _____)
5. Social Media Sites (Facebook, Instagram, Twitter)
6. Podcast. Which one(s)? _____)
7. Any other? _____

13. Have you ever publicly commented on a news story online or written a letter to the editor of a news publication?

_____ Yes _____ No

If “Yes,” what was the story about and what was your comment?

14. Are you active on any social media sites?

_____ Yes _____ No

If "Yes," what social media sites are you on?

15. This case involves allegations that a tire manufactured by Goodyear was defectively designed and manufactured causing Shane Allen Loveland and Jacob Summers to sustain serious injuries. Have you heard of, or do you have any knowledge of, this case or its facts or circumstances?

If "Yes," what did you hear and where did you hear it?

16. The judge will instruct you that you are not permitted to share anything on social media about the case or your experience as a juror during the trial. Do you believe you may have difficulty following this instruction?

_____ Yes _____ No

17. The judge will instruct you that you are not permitted to do any outside research on the case, the attorneys, the parties, witnesses, the law, the judge, other jurors, or anything else. This includes online research of any type. Do you think you would have difficulty following that instruction?

_____ Yes _____ No

18. Have you, or anyone else close to you, ever been employed by Goodyear Tire and Rubber Company?

_____ Yes _____ No

If "Yes," please describe who, the experience, and when this occurred.

19. Have you, or anyone else close to you, ever been employed in any business that provides products or services to Goodyear Tire and Rubber Company?

_____ Yes _____ No

If "Yes," please describe who, the experience, and when this occurred.

20. Do you have any employment, education, training, policy development, volunteer experience, or other experience in the following areas? (Check Yes or No for each.)

	Yes	No
Tire design, manufacture, re-treading, or sales		
Evaluation, review or investigation of claims		
A medical related job		
Investigation of people		
Law enforcement or investigation		
Attorney, law office or the court system		
Insurance		
Accident investigation or reconstruction		
Fire Department or paramedics		
Engineering		
Writing, proof reading or analysis of product warranties		
Care of the elderly or disabled		
Fine arts or music		
Education/Teaching		
Counseling or mental health		
Rehabilitation		

If "Yes," to any of the above categories, please describe:

21. Have you ever served as a juror before?

_____ Yes _____ No

If "Yes," were you the foreperson?

_____ Yes _____ No

22. In a legal matter, have you (or anyone close to) you ever: (check all that apply)

_____ Filed a lawsuit or sued someone (been a plaintiff in a lawsuit)?
_____ Been sued by someone (been a defendant in a lawsuit)?
_____ Been a witness or an expert in a lawsuit?
_____ Other involvement in a lawsuit (other than juror)

If "Yes," please describe who, the experience, and the time frame of your experience.

23. Have you ever used the services of a lawyer for any reason, other than divorce or criminal issues?

_____ Yes _____ No

If "Yes," please describe who the attorney(s) were, and the time frame of your experience.

24. Have you or anyone close to you ever sustained an injury you believed was due to someone else's negligence, whether it was a person, a company or anyone else, even if you did not sue?

_____ Yes _____ No

If "Yes," please describe your experience.

25. Do you follow state and local politics? (Candidates, issues, trends) _____ Yes _____ No

26. Do you have any military experience? _____ Yes _____ No

27. Have you ever voted for or against a politician based on his/her views or policies towards the civil justice system?

_____ Yes _____ No

28. Do you hold any negative opinions about corporations, in general?

_____Yes _____No

29. Have you or any members of your family or close friends ever owned or operated your own business?

_____ Yes _____ No

30. How would you describe your knowledge of vehicles (circle the one that best applies)?

1. I know a lot about vehicles.
2. I know an average amount about vehicles.
3. I know very little about vehicles.

31. Do you, any members of your family, or close friends have any special knowledge of or experience in tire design, manufacturing, re-treading or repair?

_____ Yes _____ No

If “Yes,” please describe the experience, and the time frame of your experience.

32. Have you, or any of your family members, or close friends ever owned a Goodyear tire?

_____Yes _____No _____Unsure

33. Have you ever suggested to another person that they should buy Goodyear tires, or requested Goodyear tires for your vehicle?

_____Yes _____No _____Unsure

34. Do you, for any reason, avoid using Goodyear brand tires?

_____Yes _____No

If “Yes,” please explain.

35. Would any of your experiences with Goodyear products affect the way you viewed a case involving one of its tires?

☐ Yes ☐ No

If "Yes," please explain.

36. Have you purchased used tires for your vehicle?

☐ Yes ☐ No

37. Do you drive a vehicle that is over 10 years old?

☐ Yes ☐ No ☐ Not sure

38. Have you ever had tires on your vehicle that were more than 10 years old?

☐ Yes ☐ No ☐ Not sure

39. Have you ever had an issue with a tire that you thought was defective?

☐ Yes ☐ No

If "Yes," please explain.

40. Have you, or anyone else close to you, ever been employed in concrete manufacturing, concrete delivery, concrete pouring, concrete stamping, or concrete sales?

☐ Yes ☐ No

If "Yes," please describe who, the experience, and the time frame of your experience.

How much do you disagree or agree with the following opinions? Circle a number between 1 and 7, where 1 is “Disagree strongly” and 7 is “Agree strongly”. (You may use any number in between as well.)

41. There are too many lawsuits.

Disagree Strongly 1 2 3 4 5 6 7 Agree Strongly

42. Corporations will sacrifice safety if it means making more money.

Disagree Strongly 1 2 3 4 5 6 7 Agree Strongly

43. Jury awards are too high.

Disagree Strongly 1 2 3 4 5 6 7 Agree Strongly

44. It is an important part of a jury’s job to send messages to the community and to corporations with its verdict.

Disagree strongly 1 2 3 4 5 6 7 Agree Strongly

45. I would have a hard time putting my sympathy aside in a case in which a person was seriously and permanently injured.

Disagree Strongly 1 2 3 4 5 6 7 Agree Strongly

46. People are too ready to sue.

Disagree Strongly 1 2 3 4 5 6 7 Agree Strongly

47. In a case in which an injured person is suing a big company, I would more likely root for the injured person.

Disagree Strongly 1 2 3 4 5 6 7 Agree Strongly

48. There should be strict rules for determining damages in personal injury lawsuits.

Disagree strongly 1 2 3 4 5 6 7 Agree Strongly

49. The justice system is rigged against the little guy.

Disagree strongly 1 2 3 4 5 6 7 Agree Strongly

50. Lawsuits are costing us all too much money.

Disagree Strongly 1 2 3 4 5 6 7 Agree Strongly

51. If someone is injured while using a company's product, that company should pay the injured person, regardless of the circumstances.

Disagree Strongly 1 2 3 4 5 6 7 Agree Strongly

52. Sometimes lawyers file lawsuits in an attempt to take unfair advantage of wealthy individuals or companies.

Disagree Strongly 1 2 3 4 5 6 7 Agree Strongly

53. If a case makes it all the way to a jury trial, the defendant must have done something wrong.

Disagree Strongly 1 2 3 4 5 6 7 Agree Strongly

54. Most drivers would be unable to control a vehicle if the tire lost its tread (not went flat, but lost its tread) at highway speed.

Disagree Strongly 1 2 3 4 5 6 7 Agree Strongly

55. If a tire loses tread, there must be something wrong with the way the tire was made.

Disagree Strongly 1 2 3 4 5 6 7 Agree Strongly

56. I am a safer driver than most other drivers.

Disagree Strongly 1 2 3 4 5 6 7 Agree Strongly

57. I would be able to control my vehicle even if a tire suddenly de-treaded (not just a flat tire).

Disagree Strongly 1 2 3 4 5 6 7 Agree Strongly

58. A tire should be designed to never lose tread regardless of how it is used or maintained.

Disagree Strongly 1 2 3 4 5 6 7 Agree Strongly

59. Most people never read warranties.

Disagree Strongly 1 2 3 4 5 6 7 Agree Strongly

60. Goodyear is a company you can trust to make safe products.

Disagree Strongly 1 2 3 4 5 6 7 Agree Strongly

The following are types of damages people can seek money for in a lawsuit. If there was evidence for it, would you be willing to award money for...

61. Medical expenses? ☐ Yes ☐ No
62. Mental anguish? ☐ Yes ☐ No
63. Pain and suffering? ☐ Yes ☐ No
64. Loss of wages ☐ Yes ☐ No
65. Punitive damages? ☐ Yes ☐ No

66. If a seriously and permanently injured person fails to prove a company is to blame for his injuries in a lawsuit, would you have difficulty giving a verdict in which the person receives no money?

☐ Yes ☐ No

67. Have you or any family members been involved in an injury automobile accident?

☐ Yes ☐ No

68. Have you or any family members had a serious accident because of a tire that blew out or de-treaded (as opposed to a tire going flat)?

☐ Yes ☐ No

69. Have you, a family member, or close friend, ever been a witness to a wreck because a tire blew out or de-treaded?

☐ Yes ☐ No

70. Have you or a member of your family ever been injured while using any kind of product, whether medical, mechanical, etc.?

☐ Yes ☐ No

If "Yes," were those injuries caused, at least in part, by something you believe was wrong with the product?

☐ Yes ☐ No

If "Yes," to either question above, please explain

71. Do you support legislative proposals to place caps or limits on the amount of money juries can award?

☐ Yes ☐ No

72. Which of the following best describes your political affiliation?

- | | |
|----------------|------------------|
| 1. Democrat | 2. Republican |
| 3. Independent | 4. Green party |
| 5. Tea party | 6. Other |
| 7. None | 8. Refuse to say |

73. Do you think of yourself as a liberal, a moderate or a conservative?

1. Liberal
2. Moderate
3. Conservative

74. What race or races do you consider yourself to be? The U.S. Census categories are:

- | | |
|--|-------------------------------------|
| 1. White (Caucasian) | 2. Black or African American |
| 3. Asian | 4. American Indian or Alaska Native |
| 5. Native Hawaiian or other Pacific Islander | 6. Hispanic/Mexican American/Latino |

75. Do you have significant uncorrected visual impairment that might prevent you from reading charts and materials from a distance?

_____Yes _____ No

If "Yes," please explain.

76. Do you have any medical or physical problems, including any medications, that might affect your ability to serve as a juror?

_____ Yes _____ No

If “Yes,” please explain

77. In a court of law, everyone is seen as equal no matter who you are—even if you are a company. Do you feel you could not give a company the same consideration in a lawsuit as they would an individual?

_____ Yes _____ No

78. In a civil lawsuit, the plaintiff who brings the lawsuit has the burden to prove his or her claims. As the judge will instruct you, the defense has no burden of proof. Do you have opinions about this law that you would still apply a burden of proof to the defendant company in this case?

_____ Yes _____ No

79. Is there any reason at all (for example, religious, political or personal) that would make it difficult for you to be a fair and impartial juror in this case?

_____ Yes _____ No

If “Yes,” please explain.

80. Is there anything else the Court should know that might affect your ability to serve as a juror (e.g., emotional difficulties, concerns about the case subject, etc.)?

_____ Yes _____ No

If “Yes,” please explain.

81. Is there something that you would rather discuss in private with the Court?

_____ Yes _____ No

82. Would you like to serve as juror in this case?

_____ Yes _____ No

If “Yes,” please explain.

Please review the following list of people and organizations. If you or any of your family or close friends know or associate with anyone on this list, please circle who and explain how you know them below.

Rysta Leona Susman	Shane Allen Loveland	Jacob Summers
Larry Blair	Goodyear Tire & Rubber Company	Dandee Concrete Construction Co. Inc.
Trooper Joseph Flasnck	Rob Gibson	Mary K. Gibson
Daniel T. Buser	Kramer's Towing	Action Care Ambulance Inc.
Wood River Rescue Unit	Good Samaritan EMS	Shelton Volunteer Fire & Rescue
David Southwell	Micky Gilbert	Craig Lichtblau, MD
Bernard Pettingill, Ph.D.	Chris Cornett, MD	William Sorrell, MD
Kearney Towing & Repair Center, Inc.	Jay Lawrence	Beale Robinson
Richard Olsen	Ray Young	Keith Trares
Madeline Komenic	Joseph Zekoski	James Stroble
Robert Altvater	Mark Grund	Yutaka Ito
Dr. Robert Crandall	Dr. Scott Smith	Joseph Grant
Stephen J. Fenton	Gray Beauchamp	Elizabeth Raphael
Alan Weintraub	Cathlin Vinett Mitchell	Ernest Goss
Nathan Dorris	Michael "Mike" Kerns	CHI Health Good Samaritan, Kearney, NE
Kearney Clinic, P.C.	Madonna Rehabilitation Hospital	Colorado Blood and Cancer Care
Learning Services Neurobehavioral Institute	Swedish Medical Center	Panorama Orthopedics & Spine Center
Kearney Regional Medical Centre	Madonna Rehabilitation Hospital	University of Nebraska Medical Center
New West Sports Medicine and Orthopaedic	The Law Firm of Kaster, Lynch, Farrar & Ball	The Law Firm of Schewebel, Goetz & Sieben, P.A.
The Fraser Stryker Law Firm	The Law Firm of Greensfelder, Hemker & Gale	The Law Firm of Baird Holm
The Law Firm of Yost & Baill	Attorney Kyle W. Farrar	Attorney Wesley T. Ball
Attorney Paul Godlewski	Attorney Michael F. Coyle	Attorney Edward S. Bott, Jr.
Attorney Clark Hedger	Attorney Julianne M. Rodriguez	Attorney Jennifer D. Tricker
Attorney Nicole M. Kustermann	Robert X. Cringely	Paul Schenarts, MD
James Mahalek, MD		

Person

Nature of contact

I affirm, under penalty of perjury, that I have given complete and honest answers to all of the questions above.

Signature

Date